

EXHIBIT 1

From: Aisha Bembry

Sent: Friday, March 19, 2021 1:07 PM

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Cc: Waleed Nassar <Waleed.Nassar@LBKMLAW.com>; Alan Kabat <kabat@bernabeipllc.com>

Subject: MDL 1570 - Meeting re: March 11 Order as to Dr. Naseef

Counsel,

In reference to the Court's March 11 Order (attached) directing the parties to jointly submit a proposal as to the litigation with respect to Dr. Naseef, are you available for a meeting this upcoming Monday, March 22nd? We are generally available before 2 pm. Please let us know your availability and we will circulate a Zoom meeting invite.

Regards,
Aisha

Aisha E. Bembry

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March 8, 2021

VIA ELECTRONIC FILING

Hon. Sarah Netburn
United States Magistrate Judge
Southern District of New York
Thurgood Marshall United States Courthouse
40 Foley Square
New York, NY 10007

Re: *In re: Terrorist Attacks on September 11, 2001, 03 MDL 1570 (GBD) (SN) -
Update on Status of Dr. Abdullah Naseef's Medical Condition*

Dear Judge Netburn:

This firm, along with Bernabei & Kabat, PLLC, serves as counsel for Defendant Dr. Abdullah Naseef. We write pursuant to Your Honor's August 16, 2018 Order (ECF No. 4105) and Memo Endorsement (ECF No. 4211) to "update[e] the Court on the status of [Dr. Naseef's] medical conditions and ability to participate in this action." Since our last submission regarding Dr. Naseef's health (ECF No. 6570), there has been no improvement in his medical condition and no change in his ability to participate in this litigation.

Pursuant to Your Honor's August 16, 2018 Order, we will update the Court again in sixty (60) days or sooner, if developments warrant.

Sincerely,

Due to an ongoing medical condition, the litigation with respect to Dr. Naseef has been stalled since 2018. Accordingly, by no later than March 25, 2021, the parties shall jointly submit a proposal of no more than five pages outlining how this litigation should proceed. If the parties disagree as to the proposal, they may submit separate letters of no more than three pages each. If any submission contains confidential or sensitive medical information, it may be filed by email to Chambers with all parties copied.

SO ORDERED.

SARAH NETBURN
United States Magistrate Judge

Dated: March 11, 2021
New York, New York